



Albion-Little River Fire Protection District

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04/13/2026

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Advanced Clean Fleets 15-Day Comment Period Response

Chair Liane Randolph and the Members of the California Air Resources Board:

On behalf of the Albion-Little River Fire Protection District (ALRFPD), we appreciate the time and effort that has gone into the 15-day comment draft that has been published for public comment. While we strongly support California's climate and emissions reduction goals, the reality for rural emergency service providers is that we cannot safely serve our communities unless emergency support vehicles are appropriately exempted.

ALRFPD serves a rural, coastal response area spanning approximately 37.5 square miles along the Mendocino Coast, including the communities of Albion, Little River, and surrounding areas. Our district provides all-risk emergency response, including structure fires, wildland fires, emergency medical services, vehicle accidents, rescue operations, and disaster response.

Our operational environment presents unique and significant challenges:

- Emergency vehicles routinely travel long distances on narrow, winding, and often unpaved roads with limited access and turnaround capability.
- Apparatus must operate continuously for extended incidents, often 6–12 hours or longer during wildland fires and major emergencies.
- Currently idling restrictions limit diesel emergency vehicles from idling by automatically shutting down after 30 minutes of idling, creating a serious life-safety risk, as apparatus must remain running to power critical equipment(ex. emergency lighting, scene lighting, pumps, ect) during incidents, any shutdown endangers responders and the public.
- Response conditions include steep terrain, coastal weather exposure, power outages, and limited infrastructure support.
- Mutual aid responses frequently extend beyond our district into neighboring jurisdictions during large-scale incidents.



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The impacts of the Advanced Clean Fleets (ACF) regulations, as currently structured, would significantly affect our ability to deliver essential emergency services:

- **Extended Response Times:** Limited availability and range of zero-emission heavy apparatus could delay response to time-critical incidents such as structure fires and cardiac emergencies.
- **Operational Limitations:** Current zero-emission technology does not reliably support sustained pump operations, drafting, or extended idling required during fire suppression and water shuttle operations.
- **Infrastructure Gaps:** Rural districts like ours lack the electrical infrastructure necessary to support rapid charging of heavy emergency vehicles, particularly during power outages or Public Safety Power Shutoff (PSPS) events.
- **Increased Costs and Reduced Readiness:** High acquisition costs and limited availability of compliant apparatus would reduce fleet reliability and delay replacement of aging equipment, increasing maintenance burdens and risk of mechanical failure during emergencies.

To prevent unnecessary loss of life and property in the communities we serve, we respectfully request that the Board reconsider the amendments outlined in the October 7th letter submitted by the California Special Districts Association, League of California Cities, and California State Association of Counties, collectively representing over 5,000 local agencies and 40 million residents.

Local agencies like ours remain committed to supporting the State's climate goals and transitioning to cleaner technologies where feasible. However, the current ACF mandates impose significant challenges that directly impact our ability to maintain critical emergency response capabilities.

We respectfully request that vehicles supporting emergency services be categorically exempted from the regulations in the same manner as those identified in Part (c) of § 2013, Title 13 of the California Code of Regulations. This exemption should explicitly include vehicles that respond to, assist in, and recover from emergencies and disasters, including but not limited to:

- Fire protection and fire prevention vehicles
- Emergency response command and support vehicles
- Search and rescue vehicles
- Utility and infrastructure support vehicles essential to disaster response



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Ensuring these exemptions will allow rural fire districts like ALRFPD to continue protecting life, property, and the environment while responsibly working toward long-term emissions reduction goals.

Thank you for your consideration and your continued commitment to public safety and environmental stewardship.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "M. Rees". The signature is stylized and fluid, with a long horizontal stroke at the end.

Michael Rees
Fire Chief
Albion-Little River Fire Protection District